

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.	<u>03-294</u>
v.	:	DATE FILED:	<u>5-1-03</u>
STEVEN MITCHELL a.k.a. "Steven Gray"	:	VIOLATIONS	18 U.S.C. § 1341 (Mail Fraud - 1 Count) 42 U.S.C. § 408 (Unlawful Use of Social Security Number - 1 count)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

THE DEFENDANT

1. Defendant STEVEN MITCHELL was a 41-year-old individual, who lived and worked in Philadelphia.

THE VICTIMS

2. All American Life Insurance Company regularly issues life insurance policies to qualified applicants in all 50 states.

3. Valley Forge Life Insurance Company, a subsidiary of CNA Insurance Company, regularly issues life insurance policies to qualified applicants in all 50 states.

LIFE INSURANCE POLICIES

4. On November 28, 1988, T.M. purchased a \$250,000 life insurance policy from the All American Life Insurance Company. T.M. listed his wife, J.M., as the beneficiary.

5. On March 16, 1997, T.M. purchased a second life insurance policy from the Valley Forge Life Insurance Company for \$500,000 of coverage. T.M. again listed his wife, J.M., as the beneficiary.

THE SCHEME

6. From on or about April 7, 2001, to in or about October, 2002, defendant STEVEN MITCHELL devised and intended to devise a scheme to defraud two life insurance companies and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme that:

7. On April 7, 2001, Lowell Mitchell died at his home at 739 Linden Street, Bethlehem, PA.

8. On or about April 7, 2001, Steven Mitchell learned that his distant relative, Lowell Mitchell, had passed away.

9. On or about April 7, 2001, Steven Mitchell spoke to L.M., the deceased's widow, and advised her to tell the authorities that Lowell was a nickname and that her husband's real name was T.M.

10. In or about April, 2001, defendant STEVEN MITCHELL advised his mother, J.M., that her estranged husband, T.M., was dead and that she was the beneficiary of his life insurance policies.

11. In or about April, 2001, J.M., at the request of defendant STEVEN MITCHELL, provided a power of attorney to STEVEN MITCHELL to act on her behalf with regard to T.M.'s life insurance policies.

12. In or about April, 2001, defendant STEVEN MITCHELL advised J.B., an insurance agent, that his father passed away, knowing that his father was actually alive. STEVEN MITCHELL provided J.B. with a bogus death certificate which indicated that T.M. was deceased.

13. In or about April, 2001, defendant STEVEN MITCHELL asked J.B. to file death claims with the two insurance companies.

14. In or about April, 2001, per the direction of defendant STEVEN MITCHELL, J.B. filed, via the U.S. Mail, two death claims for benefits in the aggregate amount of \$750,000 with the insurance companies holding the policies for T.M.

15. In or about May, 2001, J.B. provided a check from Valley Forge Life Insurance Company in the approximate amount of \$500,000 to defendant STEVEN MITCHELL, which

represented payment of the life insurance policy covering T.M.

16. In or about May, 2001, defendant STEVEN MITCHELL unsuccessfully attempted to cash the \$500,000 check.

17. On or about April 25, 2001, in the Eastern District of Pennsylvania and elsewhere, having devised and intending to devise the scheme, defendant

STEVEN MITCHELL

for the purpose of executing the scheme and attempting to do so, knowingly caused to be delivered by mail to Valley Forge Life Insurance Company, according to the directions thereon, a false claim for \$500,000 in death benefits and a bogus death certificate, which falsely represented that the insured, T.M., was dead, when defendant STEVEN MITCHELL well knew that T.M. was alive.

In violation of Title 18, United States Code, Section 1341.

COUNT TWO

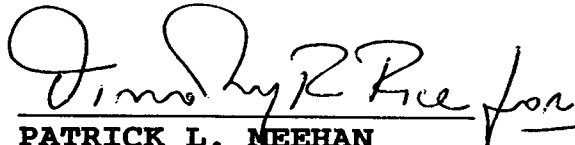
THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. On or about June 22, 1999, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, the defendant

**STEVEN MITCHELL
a.k.a. "Steven Gray"**

with intent to deceive, and for the purpose of obtaining a second Pennsylvania Motor Vehicle Operator's license, falsely represented that Social Security account number 208-68-6051 had been assigned to him by the Secretary of the United States Department of Health and Human Services, under the alias "Steven Gray," when in fact such number was not the account number assigned to him.

In violation of Title 42, United States Code, Section 408(a)(7)(B).


PATRICK L. NEEHAN
United States Attorney